

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: (803) 737-0800
Fax: (803) 737-0801

DAN FARNETT
CHIEF OF STAFF

August 10, 2007

VIA EFILING AND HAND DELIVERY

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Re: Petition of the Office of Regulatory Staff For Commission to Order a Rule To Show Cause As To Why The Certificates Of Public Convenience and Necessity for Certain Providers of Telecommunications Services Should Not Be Revoked
PSC Docket No.: 2007- 253-C

Dear Mr. Terreni:

Enclosed for filing please find the original and one (1) copy of the Office of Regulatory Staff's First Continuing Data Request for IDT America Corporation in the above referenced docket.

Note that the attached documents are exact duplicates, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

Thank you for you assistance and let me know if you have any questions.

Sincerely,

Shealy Boland Reibold

Shealy Boland Reibold

SBR/pjm
Enclosure

cc: John J. Pringle, Jr., Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-253-C

IN RE: Petition of the Office of Regulatory)	FIRST SET OF CONTINUING
Staff for Commission to Order a Rule)	DATA REQUESTS
To Show Cause as to Why the Certificates)	
Of Public Convenience and Necessity for)	
Certain Providers of Telecommunications)	
Should Not be Revoked)	
<hr/>		

TO: JOHN J. PRINGLE, JR., ATTORNEY FOR IDT AMERICA CORPORATION:

Pursuant to S.C. Code Ann. Sections 58-4-10, 58-4-50, and 26 S.C. Code Regs. 103-833, the Office of Regulatory Staff hereby serves its First Set of Continuing Data Requests upon IDT America Corporation (hereafter referred to as IDT).

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-833, that you answer the following data requests in writing and under oath within twenty (20) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" or "provide" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach

to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

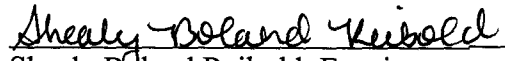
IT IS THEREFORE REQUESTED:

- I. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- II. That all responses to the data requests below be labeled using the same numbers as used herein.
- III. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- IV. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- V. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Shealy Boland Reibold of the South Carolina Office of Regulatory Staff.
- VI. That this entire list of questions be reproduced and included in front of each set of responses.
- VII. That each question be reproduced and placed in front of the response provided.
- VIII. That IDT provide three (3) paper copies/binders of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that IDT provide an electronic version of the responses.
- IX. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.

- X. That in addition to the signature and verification at the close of IDT's responses, the IDT witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XI. This Data Request shall be deemed to be continuing so as to require IDT to supplement or amend its responses as any additional information becomes available.
- XII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

- 1-1 Please identify the underlying ILECs which provide service to IDT in South Carolina.
- 1-2 Please identify the number of customers for which IDT provides telecommunications services in South Carolina.
- 1-3 Please provide a detailed customer list identifying IDT's South Carolina customers and including such information as names, addresses, and telephone numbers for those customers.
- 1-4 Please provide a detailed description of IDT's process of notifying customers in the event that services are terminated.
- 1-5 Please provide copies of the scripts and/or letters used to notify customers in the event of termination of service and a timeline for implementation.


Shealy Boland Reibold, Esquire
South Carolina Office of Regulatory Staff
1441 Main St., Ste. 300
Columbia, SC 29201
Phone: (803) 737-0800
Facsimile: (803) 737-0895
Email: sreibol@regstaff.sc.gov


August 10, 2007

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2007-253 – C

IN RE: Petition of the Office of Regulatory Staff)
 for Commission to Order a Rule To Show)
 Cause as to Why The Certificates of Public)
 Convenience and Necessity for Certain) **CERTIFICATE OF SERVICE**
 Providers of Telecommunications Services)
 Should Not be Revoked)

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, SC, 29202



Pamela J. McMullan

August 10, 2007
Columbia, South Carolina